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Counsel for Highland Capital Management, L.P.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Chapter 11
HIGHLAND CAPITAL MANAGEMENT, L.P., ¹	§	
	§	Case No. 19-34054-sgj11
Reorganized Debtor.	§	
HIGHLAND CAPITAL MANAGEMENT, L.P.,	§	
	§	
Plaintiff,	§	Adversary Proceeding No.
	§	
vs.	§	21-03010-sgj
	§	
HIGHLAND CAPITAL MANAGEMENT FUND	§	
ADVISORS, L.P., AND NEXPOINT ADVISORS,	§	
L.P.,	§	
	§	
Defendants.	§	

**DECLARATION OF JOHN A. MORRIS IN SUPPORT OF HIGHLAND'S
RESPONSE TO OBJECTIONS TO TRIAL SUBPOENAS DUCES TECUM**

¹ The Reorganized Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Reorganized Debtor is 100 Crescent Court, Suite 1850, Dallas, TX 75201.

I, John A. Morris, pursuant to 28 U.S.C. § 1746, under penalty of perjury, declare as follows:

1. I am an attorney in the law firm of Pachulski, Stang, Ziehl & Jones LLP, counsel to Highland Capital Management, L.P., the reorganized debtor in the above-captioned chapter 11 case and plaintiff in the above-referenced adversary proceeding, and I submit this Declaration in support of *Highland's Response to Objections to Trial Subpoenas Duces Tecum* (the "Response"). All capitalized terms used but not defined herein have the meanings given to them in the Response. I submit this Declaration based on my personal knowledge and review of the documents listed below.

2. Attached as **Exhibit 1** is a true and correct copy of the March 4, 2022 deposition of Dustin Norris.

3. Attached as **Exhibit 2** is a true and correct copy of an e-mail, dated March 15, 2022, notifying the Advisors' counsel that Highland intends to serve subpoenas seeking documents relating to the Postpetition Payments.

4. Attached as **Exhibit 3** is a true and correct copy of an e-mail, dated March 15, 2022, emailing copies of the subpoenas to the Advisors' counsel and asking whether counsel was authorized to accept service.

5. Attached as **Exhibit 4** are true and correct copies of several emails to the Advisors' counsel seeking confirmation as to whether Advisors' counsel would accept service of the subpoenas (as well as the subpoenas for Mr. Dondero and Mr. Norris).

6. Attached as **Exhibit 5** is a true and correct copy of excerpts of relevant portions of the March 28, 2022 deposition of Frank Waterhouse.

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Dated: April 11, 2022

/s/ John A. Morris
John A. Morris